

Minnesota Pollution Control Agency

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January 25, 2001

US EPA RECORDS CENTER REGICN 5

Mr. Charles Meyer, City Manager City of St. Louis Park 5065 Minnetonka Boulevard St. Louis Park, MN 55416 Mr. Thomas Reilly, Jr., President Reilly Industries 300 North Meridian Street, Suite 1500 Indianapolis, IN 46204-1763

RE: United States of America, et al. Vs. Reilly Tar & Chemical Corporation, et al. File No. Civ. 4-89-468, Consent Decree - Remedial Action Plan (CD-RAP) Section 7.4.1; Gradient Control System Modifications in the Prairie du Chein/Jordan Aquifer Section 7.4.2; W48 Pumping Rate - SLP6 Action Criteria Addendum to Agencies Letter October 19, 2000

Dear Mr. Meyer and Mr. Reilly:

The Agencies, Minnesota Pollution Control Agency (MPCA) and U.S. Environmental Protection Agency (U.S. EPA) issued a letter, dated October 19, 2000, regarding the gradient control system in the Ordovician Prairie du Chein (OPDC) Aquifer. The MPCA subsequently met with the city of St. Louis Park and representatives on October 6, 2000 and November 17, 2000. This letter is prepared as an addendum to the above-cited letter in response to issues discussed during the meetings.

The Agencies letter incorrectly listed the schedule to initiate sentry well sampling as "beginning in Fall 2000". This should have been stated as "beginning in spring 2001".

The letter identified the monitoring well network on Table 1. The city requested revision of the sampling frequency at wells W29, W40 and W70. The Agencies hereby approve sampling W40 and W70 on an every two years schedule. Well W29 is required to sampled annually, as listed on Table 1. A revised Table 1 is attached to this letter. These modifications will also be included in the approval letter for the 2001 Sampling Plan (pending).

Well W413 is approved for installation in the OPDC aquifer as a sentry well. The well is required to be installed within 60 days of the date the city received the October 19, 2000 letter. The city has requested to postpone the installation of W413 until the ground water flow modeling for the OPDC aquifer is completed. The calibrated model is anticipated to be completed by the end of February 2001. The city is hereby authorized to delay installing the well until the modeling is complete and the results of potential pumping at the Meadowbrook Golf Course well are interpreted.

Mr. Charles Meyer, and Mr. Thomas Reilly, Jr., President Page 2 January 25, 2000

The city also requested authorization to abandon well W105 installed in the Ironton Galesville (IGVL) aquifer. The Agencies reviewed this request and will not authorize abandoning W105. W105 is the only well installed in the IGVL aquifer and contains elevated PAH concentrations. Monitoring data from this well is beneficial to assess the plumes in various aquifers.

We appreciate meeting with you to sort through the project issues. If you have any questions regarding the project, please feel free to contact Nile Fellows at (651) 296-7299, or Paul Bulger at (651) 296-7827.

Sincerely,

Nile Fellows Project Manger

Site Remediation Section

Metro District

Darryl Owens

Remedial Project Manager Remedial Response Branch

U.S. Environmental Protection Agency

NF/DO:csa

cc: Bill Gregg, ENSR Consulting and Engineering Virginia Yingling, Minnesota Department of Health

Table 1 - Monitoring Well Network Prairie du Chein/Jordan Aquifer

| QUARTERLY | ANNUAL | SAMPLING | WATER LEVEL |
|-----------------------|----------|---------------------------------------|-------------------------|
| SAMPLING ¹ | SAMPLING | EVERY TWO | MONITORING ³ |
| | | YEARS ² | |
| SLP 6 | E2 | SLP7 or SLP9 | E4 |
| W 119 | E3 | SLP14 | SLP5 |
| W48 | E7 | SLP16 | SLP8 |
| W413 | E13 | Н6 | W32 |
| | E15 | MTKA6 | |
| | SLP4 | W405 or W406 | |
| | SLP10/15 | | |
| | W23 | | |
| | W29 | | |
| | W40 | | |
| | W70 | : | |
| | W401 | · · · · · · · · · · · · · · · · · · · | |
| | W402 | | |
| | W403 | | |
| | | | |

^{1 –} Sampling refers to analyzing the samples for PAH parameters using ppt detection.

^{2 -} Wells sampled every two years shall alternate the season the well is sampled. For example - well SLP14 is to be sampled in Fall 2000, then Spring 2002, then Fall 2004, etc.

^{3 –} Water level monitoring is to be completed in spring and fall of each year.